

Status of Rosemont Mitigation Proposals*

Based on Hudbay's latest mitigation proposal, *Rosemont Copper Project – Habitat Mitigation and Monitoring Plan dated September 26, 2014.*

Site	Overall Acres	WOTUS Acres	Proposed Mitigation	WOTUS gain/loss	Adequacy of Mitigation
Rosemont	4800	101	Eliminate WOTUS for mine pit and tailings	-68	40 ac fill +28 "secondary" impact of surface diversions. New hydro analysis shows secondary impacts underestimated.
Sonoita Creek Ranch	1580	104	Construct new WOTUS, preserve and enhance existing with livestock fencing.	+52	<ul style="list-style-type: none"> Out of watershed. EPA's contractors found high risk of failure, and result in net decrease of function of Sonoita Creek. No success metrics for purported enhancement via livestock exclusion. Existing easements conflict with mitigation objectives.
Helvetia	939	39	Preservation. Livestock exclusion fencing, fixing ranch roads or upland gullies.	0	<ul style="list-style-type: none"> Out of watershed, west of Santa Rita Mts. No assessment demonstrating activities will improve waters, including upland riparian buffers seeking to offset lost WOTUS. Mineral Rights not included, leaving site vulnerable.
Fullerton	1763	50	Preservation. Livestock exclusion fencing, fixing ranch roads or upland gullies and remove horse corral.	0	
Davidson Canyon Parcels	545	16	Preservation only.	0	<ul style="list-style-type: none"> Parcels are within groundwater drawdown impact zone. No demonstrated preservation need/development threat. All Mineral Rights not owned by Rosemont.
Pantano Dam "In-Lieu Fee"	2	1	Enhancement of uplands and existing waters.	0	<ul style="list-style-type: none"> Mitigation rejected by the Corps. No approved ILF Program Infeasible due to hydrogeology of site.
Other proposed mitigation activities					
Water Rights Sever and Transfer: 1,122 AFA at Pantano, and 590 AFA at Sonoita Creek Ranch			<ul style="list-style-type: none"> Actual recorded yield is 360 AFA at Pantano, and trending lower (drought and climate change). Even at full theoretical yield, release below Pantano Dam won't offset 14 miles of dewatered streams above the dam. For Sonoita, Rosemont has not verified volumes, but historical documents suggest less water available. 		
923 Acres of Upland Riparian Buffer: Livestock exclusion fencing at preservation parcels above			<ul style="list-style-type: none"> Upland buffer habitat already proposed for preservation at each site identified above. Requests buffer credit to offset impacts to waters yet the in-kind direct and secondary impact of buffer habitat at mine site is not being compensated. 		

**Note: None of the above mitigation activities are designed to address the surface water impacts from groundwater drawdown. To EPA's knowledge, no agency is attempting to do so.*